

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

THOMAS CIENIEWICZ,	:	
	:	
Plaintiff,	:	
	:	Civil Action No. 1:22cv172
v.	:	
	:	
DR. GHAFORPOUR, et al.,	:	
	:	
Defendants.	:	

**MEMORANDUM IN SUPPORT OF MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF’S COMPLAINT**

Defendant, First Sergeant David Elliott, by counsel, hereby submits his Memorandum in Support of Motion for Extension of Time to File a Response to Plaintiff’s Complaint.

This action alleges that he received inadequate medical care while he was an inmate at the Chesapeake City Jail and alleges that this defendant is liable under 42 U.S.C. §1983. Defendant recently received his summons via mail and undersigned counsel requires additional time to investigate plaintiff’s claims, to acquire pertinent documents, and to confer with defendant about the claims and his defenses. As such, defendant requests an extension of time to file his response to the Complaint to August 14, 2022 and respectfully submits the attached proposed order (Exh. A).

Therefore, defendant First Sergeant David Elliott, respectfully requests this Court to extend the time for his response to plaintiff’s Complaint to August 14, 2022.

FIRST SERGEANT DAVID ELLIOTT

By: _____/s/_____
Of Counsel

Jeff W. Rosen, Esq., VSB No. 22689
PENDER & COWARD, P.C.
222 Central Park Avenue, Suite 400
Virginia Beach, VA 23462
Phone: (757) 490-6253
Fax: (757) 497-1914
jrosen@pendercoward.com
Counsel for Elliott

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of July, 2022, I will electronically file the foregoing ***Memorandum of Law in Support of Motion for Extension of Time to Respond to Plaintiff's Complaint*** with the Clerk of Court using the CM/ECF system and will mail the foregoing by U.S. Mail to the following non-filing user:

Thomas Cieniewicz #1191016
HU7 Cell #239B
Greensville Correctional Center
Jarratt, VA 23870
Pro Se

_____/s/
Jeff W. Rosen, Esq., VSB #22689
PENDER & COWARD, P.C.
222 Central Park Avenue
Virginia Beach, VA 23462
Phone: (757) 490-6253
Fax: (757) 497-1914
jrosen@pendercoward.com
Counsel for Elliott